

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	
COUNTY OF HAMPTON)	C/A NO.: 2020-CP-25-_____
)	
HARRIETT MURDAUGH,)	
)	
Plaintiff,)	
)	
-vs-)	<u>SUMMONS</u>
)	(Jury Trial requested)
)	
BI-LO, LLC,)	
)	
Defendant.)	
_____)	

TO: THE DEFENDANTS ABOVE NAMED:

YOU ARE HEREBY SUMMONED and required to answer the Complaint in this action, of which a copy is herewith served upon you, and to serve a copy of your Answer to said Complaint on the subscribed at their office, 101 Mulberry Street East, Hampton, South Carolina within thirty (30) days after the service hereof, exclusive of the day of such service; and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in this Complaint.

PETERS, MURDAUGH, PARKER, ELTZROTH,
& DETRICK, P.A.

BY: s/ R. Alexander Murdaugh
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ATTORNEY FOR PLAINTIFF

Hampton, South Carolina
April 21, 2020

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)	
COUNTY OF HAMPTON)	C/A NO.: 2020-CP-25-_____
)	
HARRIETT MURDAUGH,)	
)	
Plaintiff,)	<u>COMPLAINT</u>
)	(Jury Trial requested)
-vs-)	
)	
BI-LO, LLC.)	
)	
Defendant.)	
_____)	

The plaintiff complaining that the defendant alleges:

1. The plaintiff is a citizen and resident of Hampton County, South Carolina.
2. That the defendant, Bi-Lo, LLC is owned by a single limited liability company that has members that are South Carolina residents; that Bi-Lo, LLC has its principal place of business in South Carolina; that Bi-Lo, LLC owns, operates, and maintains a grocery store located at 1703 Elm Street West in Hampton County.
3. That on April 28, 2017, the plaintiff entered the Bi-Lo store in Hampton, South Carolina to purchase groceries; that while shopping for groceries the plaintiff slipped and fell as a result of a foreign substance on the floor; that agents and employees of the defendant knew or should have known that the substance was on the floor and that the presence of that foreign substance on the floor constituted an unreasonably dangerous condition to its patrons; that as a direct and proximate result of the fall the plaintiff sustained serious and severe injuries.
4. That the direct and proximate cause of the plaintiff's injuries was the defendant's negligence in the following particulars:
 - (a) In failing to keep the aisles, passageways and such other parts of the premises in a reasonably safe condition;

- (b) In failing to maintain the store in a reasonably safe condition;
- (c) In creating a dangerous and unsafe condition on the premises by allowing a foreign substance to be and remain on the floor;
- (d) In failing to take reasonable precautions to avoid an unsafe condition from existing in said store;
- (e) In failing to put a barricade across the area of the floor which was wet;
- (f) In failing to warn customers of the dangerous condition then and there existing;
- (g) In failing to inspect said premises;
- (h) In failing to act reasonably and prudently.
- (i) In failing to properly supervise employees in such a way to keep the premises in a reasonably safe condition.

5. That as a direct and proximate result of the defendants' negligent and reckless conduct the plaintiff was injured in the following particulars: that she has been caused to suffer serious personal injuries; that she has been forced to incur doctor and medical bills; that she has been caused to endure physical pain and suffering; that she has been caused to endure mental anguish; that she has been caused to lose the enjoyment of life; that her injuries are permanent in nature and pursuant to §19-1-150 of the South Carolina Code of Laws, she will continue to incur damages into the future.

WHEREFORE the plaintiff prays for judgment both actual and punitive damages and for such other relief this court deems just and proper.

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